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Green/R7/USEPA/US
01/09/2008 08:53 AM

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cc Maryjane Wingett/R7/USEPA/US@EPA, Walter
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bcc

Subject Heads - up Regarding MDA Inspection -
ENFORCEMENT SENSITIVE

History:  This message has been forwarded.

Prior to the end of the year, I mentioned an inspection MDA was going to be doing at Greenleaf, LLC in Neosho, MO. The inspection was based upon a tip that the facility was collecting and repackaging pesticides from Walmarts that were in torn bags, etc. not suitable for retail. MDA is currently at the site, but have already contacted us to let us know what they are finding. I would consider this info. very preliminary and some of the details might change, but this is what the inspector has conveyed to MJ and I in phone conversations and a few e-mails with photos:

Excerpt from inspector: "All Wal-Mart pesticides (broken bags and unwanted pesticides) from every Wal-Mart store across the country are shipped to Neosho, MO. Since January 2007, Greenleaf has received 3.5 million pounds of pesticides from Wal-Mart. Since January 2007, Greenleaf has sold over 1,000 tons (2 million pounds) of pesticides. We're certain many of these pesticides were not registered under Greenleaf and/or misbranded. You should have received two pictures minutes ago and I will have a few more coming."

The facility is located on about 4-5 acres and there are three or more buildings on the site. Some buildings have both a roof and sides and others may only have a roof.

Material arrives in 4x4x4 totes that are made of some sort of commercial (rugged) cardboard. There are an unknown quantity of totes, but in general we were told the totes are everywhere.

The inspectors have been told there are 1 million pounds of granular insecticide, 600,000 pounds of granular herbicide, and about twenty 55-gallon drums of liquid product slurry that they told inspectors they are treating as waste and have indicated they have they have been shipping for appropriate disposal.

One building apparently has 4 floor bins in which the bags are opened and dumped. Each floor bin will hold 25 tons of product. Employees have indicated that they attempt to assure they are only dumping the same material into a given bin, but that they do get some mixed up. From visual observations, inspectors suspect that different products are likely being mixed together.

People can actually pull up with a truck and place an order. Material is placed in a plain white bag with perhaps only the company name and type of product and they are then handed a label printed from the internet that appears to lack all of the required information. As the retail material appears violative, we are placing it under SSURO.

Initial observations at the site haven't identified any obvious pesticide products exposed to the weather, etc. What pesticides they have seen appears to at least be in some sort of container or under a roof, etc. However, it seems possible there would be at least some mixed in with all of the material outside.

       
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